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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LUIS GONZALAS,

Petitioner,

vs.

BRIAN WILLIAMS, et al.,

Respondents.

Case No. 2:17-cv-01653-RFB-GWF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO FIRST AMENDED PETITION
(ECF NO. 18)**

(FOURTH REQUEST)

Respondents hereby move for an enlargement of time of 5 days from the current due date of April 27, 2020, up to and including May 1, 2020, in which to file their Answer to Luis Gonzalas' First Amended Petition for Writ of Habeas Corpus (ECF No. 18). Respondents make this motion pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and based upon the attached declaration of counsel. This is the fourth enlargement of time sought by Respondents to file the Answer, and the request is brought in good faith and not for the purpose of delay.

DATED: April 27, 2020

AARON D. FORD
Attorney General

By: /s/ Jessica Perlick
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General

DECLARATION OF JESSICA PERLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JESSICA PERLICK, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Luis Gonzalas v. Brian Williams, et al.*, Case No. 2:17-cv-01653-RFB-GWF, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Answer to the First Amended Petition is currently due on April 27, 2020.

4. I have been unable with due diligence to timely complete the Answer. I had previously requested a second short extension based on the impact of COVID-19 on all work-related issues, and believed an extra week would be sufficient time. After falling ill, I had to request a short extension to make up for the time lost, and believed that would be the final request.

5. Because I am currently working from home, I am reliant on the VPN and Remote Desktop to access my files. Unfortunately, I had technical issues over the weekend, and was completely disconnected from the server and without access to any files. I could not use the time I intended to finalize the Answer, and despite my best efforts to catch up, need additional time in which to do so.

6. I have communicated with Petitioner's counsel, C.B. Kirschner, and she does not oppose this request for an extension.

7. Based on the foregoing, I respectfully request an enlargement of time of 5 days, up to and including May 1, 2020, to file the Answer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this Monday, April 27, 2020.

IT IS SO ORDERED:

/s/ Jessica Perlick
Jessica Perlick (Bar No. 13218)
Senior Deputy Attorney General



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 28th day of April, 2020.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Motion for Enlargement of Time to File Answer to First Amended Petition for Writ of Habeas Corpus (ECF No. 18) (Fourth Request)* with the Clerk of the Court by using the CM/ECF system on April 27, 2020.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

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/s/ C. Martinez
An employee of the Office of the Attorney General